

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

2018 NOV -8 P 12:36

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

IN RE: LUMBER LIQUIDATORS CHINESE-
MANUFACTURED FLOORING DURABILITY
MARKETING AND SALES PRACTICE
LITIGATION

MDL No. 1:16MD2743 (AJT/TRJ)

This Document Relates to ALL Cases

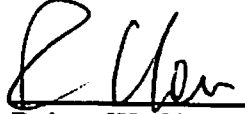
**CLASS MEMBER DIANA CANTU-GUERRERO'S MOTION TO DENY APPEAL
BOND**

Objecting class member Diana Cantu-Guerrero, in accordance with this Court's October 9, 2018 order, moves for this Court to deny entry of an appeal bond, and alternatively for any appeal bond to be set no higher than \$5,000. This Court's October 9, 2018 order granting final approval of the settlement ordered "any objecting class member who appeals [the] Order to file simultaneously with their notice of appeal a motion stating their position as to what bond amount, if any, should be set." Doc. 157 at 18. Ms. Cantu-Guerrero believes no appeal bond is appropriate under Fed. R. App. P. 7. To the extent one is allowed, however, nothing more than \$5,000 should

be permitted. The bases for Ms. Cantu-Guerrero's motion are set forth in the accompanying Memorandum of Law.

DATED: November 8, 2018

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Clore', written over a horizontal line.

Robert W. Clore

Pro Hac Vice

Texas State Bar #24012436

BANDAS LAW FIRM, P.C.

500 North Shoreline, Suite 1020

Corpus Christi, TX 78401

(361) 698-5200

*Counsel for Objecting Class Member Diana
Cantu-Guerrero*

Certificate of Service

In addition to filing this objection with the Clerk's Office at 401 Courthouse Square, Alexandria, VA 22314, the undersigned certifies he caused to be served via USPS First Class Mail, postage prepaid, a copy of this Motion and associated exhibits upon the following.

DATED: November 8, 2018

Defendant Lumber Liquidators, Inc.

Lead Counsel:

Diane P. Flannery, Esq.
McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, VA 23219

Formaldehyde

Plaintiffs' Co-Lead Counsel:

Steven Toll, Esq.
Cohen Milstein Sellers & Toll PLLC
1100 New York Ave, NW
Suite 500 – West Tower
Washington, DC 20005

Durability

Plaintiffs' Co-Lead Counsel:

Alexander Robertson, IV, Esq.
Robertson & Associates, LLP
32121 Lindero Canyon Rd, Suite 200
Westlake Village, CA 91361



Robert W. Clore